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REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

Status of Claims

Claims 1-27 and 39-53 are pending in the application. Claims 1-27 and 39-53 have been rejected.

CLAIM REJECTIONS

35 U.S.C. § 103 Rejections

In the Office Action, the Examiner rejected claims 11-27, 39-41 and 43-47 under 35 U.S.C. § 103(a), as being unpatentable over Volcani et al. (Volcani, US 2003/0212655) in view of Kurzweil et al. (US 6,184,949). In addition, the Examiner rejected claim 42 under 35 U.S.C. § 103(a), as being unpatentable over Volcani in view of Kurzweil, in view of Pickover et al. (US 2003/0130898); claims 48-52 under 35 U.S.C. § 103(a), as being unpatentable over Volcani in view of Kurzweil, in view of Kinder (US 2003/0212541); and claim 53 under 35 U.S.C. § 103(a), as being unpatentable over Volcani in view of Kurzweil, in view of Anderson (US 5,678,053).

Applicants respectfully traverse the rejection of the pending claims over Volcani et al. (Volcani, US 2003/0212655) in view of Kurzweil et al. (US 6,184,949), because a prima facie case of obviousness has not been established. The combination of Kuzweil to the former Volcani, Kinder, Pickover and Anderson references does not teach or suggest all the limitations of independent claims 1, 14, 27 and 39.

Applicants respectfully assert that the Examiner has erroneously analogized the *Author Analysis Model* of Kurzweil with the *User Specific Profile* as taught and claimed in the present application. The *User Specific Profile* of the present invention is used to enhance

a presently received text, based on former writings provided by the user, whereas, Kurzweil's *Author Analysis Model*, although also based on former user writings, is used to create a new text (i.e. poem [Kurzweil Fig. 2 Step 36]) rather than to enhance a presently inputted text. Therefore, it is made clear that the types of input, the type of processing performed on these inputs and the yielded product of these two processes cardinally vary, thus, any attempt to analogize them is fundamentally mistaken.

Furthermore, the Examiner has failed to show motivation to combine the Volcani and Kurzweil references, which references relate to substantially different fields. Volcani relates to the more business oriented field of natural language processing and enhancement, Kurzweil on the other hand pertains to artistic text (poetry) which is to a far lesser extent bound to linguistic rules and grammar. Although both references are generally in the same field, it seems unreasonable to for someone looking to improve natural language processor used to enhance written text to look to the teachings of a poem generator which uses multiple writing samples to generate a poem.

Even if the standards of combining references for support of a 103 rejection were met, the combination of Volcani and Kurzweil still remains deficient of all the limitations of independent claims 1, 14, 27 and 39.

More specifically, the Examiner has analogized, two, substantially distinct methods, whose sole commonality is their use of prior user writings. Independent claims 1, 14, 27 and 39 now recite:

1. (Previously presented) A method for language enhancement, comprising:

receiving text from a user;

identifying grammatical constructs within the text;

enhancing the received text by determining at least one alternate text portion based on a user specific profile for at least one original portion of the text, the alternate text portion being consistent with the grammatical constructs of the original portion and having substantially the same meaning as the original portion but conveying a different impression; and

wherein the user specific profile is based on writing provided by the user.

14. (Previously presented) A language enhancement apparatus, comprising:
- a memory for storing **text from a user;**
 - a natural language parser for identifying grammatical constructs within the text;
 - a natural language enricher for **enhancing the text by determining at least one alternate text portion based on a user specific profile** for at least one original portion of the text, the alternate text portion being consistent with the grammatical constructs of the original portion and having substantially the same meaning as the original portion but conveying a different impression; and
 - wherein the user specific profile is based on writing provided by the user.
27. (Previously presented) A computer-readable storage medium storing program code for causing a computer to perform the steps of:
- receiving text from a user;**
 - identifying grammatical constructs within the text;
 - enhancing the received text by determining at least one alternate text portion based on a user specific profile** for at least one original portion of the text, the alternate text portion being consistent with the grammatical constructs of the original portion, and having substantially the same meaning as the original portion but conveying a different impression; and
 - wherein the user specific profile is based on writing provided by the user.
39. (Previously presented) A web service comprising:
- receiving a request including one or more sentences of natural language text;**
 - deriving at least one suggestion for **enhancing the one or more sentences based on a user specific profile**, the at least one suggestion-conveying a different impression but retaining substantially the same meaning, and the user specific profile being based on writing provided by the user; and
 - returning a response including the at least one suggestion.

As evident from the above, all independent claims of the present invention also comprise limitations, which limitations include *receipt of text* (i.e. NOT the text used to actually create the user-profile) and its *enhancement* by use of said *user specific profile*. Kurzweil, on the other hand, neither *receives* nor *enhances* a newly received text or writings, but rather generates a new text from scrap, as is explicitly repeated in the following section:

“Referring to FIG. 2, a **poetry generation** process 30 analyzes 32 an original poem and generates 34 an author analysis model. **New poems are automatically generated** 36 in conjunction with the author analysis model and/or in response to user input. **The new poetry** is outputted 38 to a display, printed or stored on a storage device.

Referring to FIG. 3, a process 40 to **generate an original poem** includes scanning 42 selections of poems by an author. The poems scanned are used to generate and store 44 an author analysis model. A user selects 46 an interface, specifically, a poetic assistant interface 48 and/or a screen saver interface 50. The process **generates 52 an original poem(s)** from the author analysis model. **The original poem(s)** is displayed 54 on the display unit, or stored on a suitable storage medium. **The poem will have a similar style** to the poem(s) originally analyzed and contained in the author analysis model, **but will be original poetry generated** by the process 30 (of FIG. 2).” (Kurzweil Col 2 Lines 32-49).

As repeated and emphasized above, Kurzweil’s teachings relate to poetry or poems and the **generation** of such. Descriptive wordings such as new and/or original are repetitively used to describe the poetical outcome of the process. As if to further differentiate, Kurzweil teaches away from the present invention by asserting that the generated poem “**will have a similar style**” to those originally analyzed, disregarding any demand for contextual correspondence, contrary to the subject matter taught and claimed in the present invention which independent claims all comprise the limitation “**having/retaining**


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substantially the same meaning as the original portion" (applicants' independent claims 1, 14, 27 and 39) an inherent characteristic of text enhancement (rather than generation).

Accordingly, Applicants respectfully assert that independent claims 1, 14, 27 and 39 are allowable. Claims 2-13, 15-26, and 40-53 depend from, directly or indirectly, claims 1, 14, 27 and 39, and therefore include all the limitations of those claims. Therefore, Applicants respectfully assert that claims 2-13, 15-26, and 40-53 are likewise allowable. Their favorable reconsideration and allowance, in view of the foregoing remarks, is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Respectfully submitted,



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